



Mail Delivery Toolkit 2018

U.S. Postal Service

Framing the Problem

While door delivery to individual homes is still common in many parts of urban and suburban America, predominantly in older single family communities, the most common form of delivery in suburban America is via a curbside mail receptacle, often accessed directly by mail truck. By contrast, multifamily communities, such as condominiums and garden apartments, have traditionally been serviced by a shared Cluster Box Unit (CBU), either located interior to the building or at a common accessible site.

However, the last 20 years has seen an extraordinary growth in new single-family subdivisions, many of which adopted characteristics of multifamily communities, including a mix of detached and attached units, shared amenities, commonly maintained open space, and restricted access points such as a gated community. Coinciding with this trend, the United States Postal Service has seen reduced revenues due to competition from private express carriers, innovations in delivery services through online ordering, and dramatically oscillating fuel prices. These competitive pressures have caused the Postal Service to reduce curbside delivery as a cost-cutting measure.

How is the U.S. Postal Service Structured?

The United States Postal Service is an independent branch of the executive office of the U.S. Government and is governed by a nine-member Board of Governors appointed by the President of the United States. The only Congressional oversight is via the fact that the board member appointees are confirmed by the U.S. Senate. The Board directs the exercise of the powers of the Postal Service, directs and controls its expenditures, reviews its practices, conducts long-range planning, approves officer compensation and sets policies on all postal matters. The Board of Governors is not to be confused with the Postal Regulatory Commission, which is an independent oversight group appointed by the President. Their mission is to ensure transparency and accountability of USPS and to promote a robust universal mail system through objective, accurate, and timely regulatory analyses and decisions and engagement with Congress and stakeholders.

NAHB has determined that the United States Postal Service to date has been a highly decentralized operational system, with very little centralized policy dictating the day-to-day operations of the service, with the exception of the Postal Operations Manual. However, this may be changing in light of their current financial struggles and overall postal reform.

Changes in Federal Requirements and Resources Relating to Mail Delivery Services

The Postal Service has determined that centralized delivery is generally the most cost-effective primary mode of delivery. However, this guidance has not been implemented uniformly across the country, as the USPS still grants discretion regarding delivery option decisions to regional managers and local postmasters, some of whom are still allowing curbside delivery without special exception.



Effective April 5, 2012, the Postal Service revised the Postal Operations Manual (POM) subchapters 61, 63, 64, and 65 in selected subsections to provide updated and revised information and procedures regarding modes of delivery and delivery equipment and to provide the USPS greater autonomy in determining how new deliveries are added to the Postal Service network.

POM Section 631 was once again revised in April 2018 to provide additional clarity and more authoritative language, leaving less room for negotiation with local postmasters. **It now explicitly states that curbside, sidewalk delivery, and door modes are generally not available for new delivery points, with very rare exceptions, as determined by the Postal Service in its sole discretion, on a case-by-case basis.**

There is also a new guidance document called [U. S. Postal Service National Delivery Planning Standards A Guide for Builders and Developers](#), which states that **builders and developers or property owners are responsible for the purchase, installation, maintenance, repair, and replacement of mailbox equipment.**

The local postal manager must approve both the mailbox sites and type of equipment. Customers will not receive mail delivery service until the units and locations are approved by the local postal management and the mail receptacles are installed.

Establishment of New Service

Establishment of city delivery service has several essential requirements, such as street signs, house numbers, paved streets, right-of-ways and turnouts, satisfactory walkways, installed mail receptacles, and a certain minimum postal population. One of these basic requirements is that at least 10 percent of the building lots in the area to be served are improved with houses or business places. This is a substantial decrease from the previous requirement of 50 percent of lots

U.S. Postal Service Builders and Developers Guide

The [U. S. Postal Service National Delivery Planning Standards A Guide for Builders and Developers](#) is a new resource created through the Delivery Growth Management Program. The program is designed to provide structure and support to developers and builders on delivery issues surrounding the establishment or extension of delivery service. Builders and developers must meet with their local USPS Growth Coordinator or representative early in the development planning phase (i.e., before they finalize plans and site plats with the appropriate planning/zoning authorities), so that the most efficient and effective delivery methods for customers can be established. To contact the local Growth Coordinator, builders and developers should email Delivery.Growth@usps.gov.

Strategies for Members and Associations

Although the POM outlines the general procedures to be followed by developers going forward, it lacks detail on how to deal with grandfathering projects currently in the development pipeline, projects caught mid-phase, maintenance and replacement in communities that lack a homeowners association (HOA), dealing with the municipal approvals process, etc.



As mentioned previously, the USPS is a highly decentralized organization, and much of the policy decision-making will derive from the regional postmaster, with guidance from such centralized policy as the Postal Operations Manual. It is therefore critical to establish a relationship with this office. Discussing mailbox type and location and obtaining approval before construction begins is critical to making sure customers receive their mail in a timely manner.

It can also be beneficial to invite the postmaster to conduct an information session with local developers and builders, where they may express concerns and ask questions. When talking with the postmaster, consider raising these issues:

Multiple-phased projects - Occasionally, there have been multi-phase projects which were approved for curbside delivery and are now being told they need to install cluster mailboxes for later phases. In these cases, it is important to meet with your Growth Management Coordinator to determine a plan for grandfathering these later phases.

Security - Issues such as lighting and crime in remote or isolated areas or areas with higher-than-average criminal activity. Curbside delivery reduces these risks by providing mail at or very near a person's residence.

Access - Other considerations are access for the elderly and persons with disabilities. This should especially be a consideration for 55+ communities, where there may be many residents who will need to apply for hardship waivers, and the requirement to reapply every year will be onerous.

Maintenance - Maintenance of the structure over time will be critical, not only for the aesthetic quality of the residential subdivision, but also the viability of the unit and any accompanying structure. In subdivisions that lack a homeowners association (HOA) to manage them after a developer transitions responsibility to the HOA, it is as yet unclear who has the responsibility for maintenance. An alternative to propose would be allowing double or triple curbside mailbox posts for subdivisions that lack an HOA.

Other Frequently Asked Questions (FAQ)

I installed curbside mailboxes in my development because I didn't know I needed to install a mode of centralized delivery. What happens now?

In the event an improper mode of delivery is established or extended by a postal carrier or manager, the service will be withdrawn with a thirty (30) day advance notice to the affected customer(s), provided that the error is detected and the customer is notified within one (1) year. If the error is not detected and the customer is not notified within one (1) year of the date delivery is established or extended, the improper service remains in place unless the customer consents to the delivery mode change or a delivery point with improper modes of delivery in a vacant delivery is first identified during the vacant period per POM section 623.5.

If a customer refuses to accommodate the Postal Service's delivery mode determination by refusing to provide an approved mail receptacle, General Delivery service may be provided at the nearest postal facility where the carrier delivery emanates or where may be otherwise available to the customer.



Whose responsibility is it to purchase, install, and maintain the centralized mailboxes?

Purchase, installation, and maintenance of mail receptacles are the responsibility of the customer per POM section 632.11 Responsibilities. There are a number of centralized mailbox manufacturers and suppliers including:

[Florence Corporation](#)
[Salsbury Industries](#)
[Postal Products Unlimited Inc.](#)
[2B Global](#)
[American Eagle](#)

It is the responsibility of the developer or builder to maintain the units and the associated infrastructure until the development is turned over to an HOA. In the absence of an HOA, it is still unclear who has the responsibility for maintenance.

Who decides the location of the centralized units?

Appropriate locations for installation should be verified with local Postmasters. The POM notes that there is no municipal authority for the approval of unauthorized centralized delivery equipment or centralized delivery systems. The [U. S. Postal Service National Delivery Planning Standards A Guide for Builders and Developers](#) includes multiple examples of how to site the units.

What if I am building a home on an infill lot in a neighborhood that has door, curbside, or sidewalk delivery?

POM section 631.51 Extension of Service within an Existing Block states that new deliveries built or established within a block of existing deliveries can only receive the same type of service as the older deliveries, subject to Postmaster approval and after consideration of Postal Service operational efficiencies.

What about residents who are elderly or handicapped and cannot walk or drive to the cluster mailbox?

POM section 631.52 Hardship Cases states that changes in the mode of delivery will be considered where service by existing methods would impose an extreme physical hardship on an individual customer. Any request for a change in delivery mode must be submitted in writing. Each request for a change in delivery service should be evaluated based on the customer's needs; a request should not be denied solely because of increased operational costs or because a family member or other party may be available to receive mail for the customer. Hardship requests must be renewed annually by the customer and approved by the Postmaster.

What if my development is in a rural area and the lots are spread far apart?

This scenario may also fall under POM section 631.52 Hardship Cases. However, rural delivery customers requesting a hardship extension must also meet current criteria for extension of rural



delivery service.

What happens if my request for alternate mode due to hardship is denied?

If the local postmaster denies a request, the request must be sent to the district for review. The final decision is made by the district manager.

My customers are having problems obtaining keys for their centralized units. What are the procedures regarding locks and keys?

The Postal Service is responsible for providing every customer a compartment lock and three keys to his or her postal-owned Cluster Box Unit (CBU). Customers may duplicate their keys if they choose, however, if all of the keys are lost, the postal service will need to install a new lock at the customers' expense.

When new centralized delivery equipment is installed, the keys may either be taped to the inside of the receptacle until the compartment is issued, or stored at the Post Office. The builder or property owner is responsible for providing lock and key service for privately owned CBUs.

How can I get more information?

If you would like to speak directly to an NAHB staff member on this issue, please contact Claire Worshtil in Land Use and Design at 1 (800) 368-5242 ext. 8309 or cworshtil@nahb.org.

For more information from the U.S. Postal Service visit <http://about.usps.com/what-we-are-doing/current-initiatives/delivery-growth-management/welcome.htm>

